UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.)
Plaintiff,)
V.) Civil Action No: 1:14-cv-14176
v.) Civil Modell No. 1.14-67-14170
PRESIDENT AND FELLOWS OF HARVARD)
COLLEGE (HARVARD CORPORATION))
)
Defendant.)
)

PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL

Pursuant to Local Rule 7.1(b)(3), Plaintiff, Students for Fair Admissions, Inc. ("SFFA") respectfully seeks leave of the Court to submit a ten (10) page reply in support of its Motion to Compel (Dkt. 64). The proposed Reply Memorandum is attached to this Motion as Exhibit 1, and a supporting declaration is attached as Exhibit 2. Pursuant to Local Rule 7.1(a)(2), undersigned counsel has conferred with counsel for Defendant, President and Fellows of Harvard College ("Harvard") and Harvard consents to the relief requested in this Motion. A reply memorandum is necessary because in its Memorandum in Opposition (Dkt. 87) Harvard makes new assertions related to discovery of applicant files, the identity of alumni interviewers and its transfer student admissions process that require a response.

WHEREFORE, SFFA respectfully requests that the Court grant its motion for leave to file a reply in support of its Motion to Compel.

Respectfully submitted,

By: /s/ William S. Consovoy

Paul M. Sanford BBO #566318 Benjamin C. Caldwell BBO #675061 BURNS & LEVINSON LLP One Citizens Plaza, Suite 1100 Providence, RI 02903 Tel: 617-345-3000

Fax: 617-345-3000 Fax: 617-345-3299 psanford@burnslev.com bcaldwell@burnslev.com

Dated: August 6, 2015

William S. Consovoy
Thomas R. McCarthy
J. Michael Connolly
Consovoy McCarthy Park PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
mike@consovoymccarthy.com

Patrick Strawbridge BBO #678274 CONSOVOY MCCARTHY PARK PLLC Ten Post Office Square 8th Floor South PMB #706 Boston, MA 02109 Tel: 617-227-0548 patrick@consovoymccarthy.com

Counsel for Plaintiff Students for Fair Admissions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Benjamin C. Caldwell

4816-0114-5126.1